

Exhibit I

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8 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, and JAKE ADAMS

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

13 L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
14 individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
15 through his guardian *ad litem* Jasmine
Hernandez, individually and as
16 successor-in-interest to Hector Puga;
A.L., a minor by and through her
17 guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
18 to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

19 Plaintiffs,

20 vs.

21 STATE OF CALIFORNIA; COUNTY
22 OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAAH KEE;
23 MICHAEL BLACKWOOD;
24 BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
25 and DOES 6-10, inclusive,

26 Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly K. Kato– Courtroom 1

**DEFENDANTS COUNTY OF SAN
BERNARDINO, ROBERT
VACCARI and JAKE ADAMS’
FOURTH SUPPLEMENTAL
DISCLOSURES PURSUANT TO
FED. R. CIV. P. 26**

Trial Date: June 2, 2025

Complaint filed: June 7, 2022
FAC filed: October 18, 2022
SAC filed: January 13, 2023
TAC filed: May 12, 2023

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

Pursuant to Federal Rules of Civil Procedure 26 and Local Rule 26-1, Defendants COUNTY OF SAN BERNARDINO, ROBERT VACCARI, and JAKE ADAMS (“County Defendants”) hereby make the following initial disclosures, based on information presently available:

II. DOCUMENTS DEFENDANT COUNTY MAY USE TO SUPPORT DEFENSE(S)

Without waiving their rights, including but not limited to their right under the attorney-client privilege and work product doctrine, as well as right to privacy, and any privileges afforded Defendant, Defendant identifies the following documents or categories of documents they may use in support of their defenses:

29. GoFundMe: Fundraiser by Gabriela Salas Help for funeral for Hector J. Puga, bate stamped *COSB009498-COSB009510*.
30. Facebook Profile – Puga, bate stamped *COSB009511-COSB009557*.
31. Restraining Order Documents re Maria R. Cadena 03/07/13, Case #NQ018271, bate stamped *COSB009558-COSB009577*.
32. Request Order Documents re Maria R. Cadena 01/25/13, Case #NQ018271, bate stamped *COSB009578-COSB009587*.
33. Case Summary re Restraining Order re Maria Cadena, Case #NQ018271, bate stamped *COSB009588-COSB00958*.
34. Case Summary re Restraining Order re Yobana Puga, Case #BQ047632, bate stamped *COSB009590-COSB009593*.
35. Case Summary re Restraining Order re Yobana Puga, Case #BQ045673, bate stamped *COSB009594-COSB009595*.
36. Emergency Protective Order re Linda Rangel 01/29/19, Case #T-1900506, bate stamped *COSB009596*.

1 37. Restraining Order Documents re Yobana Puga and child 02/04/15, Case
2 #BQ047632, bate stamped *COSB009614-COSB009631*.

3 38. Restraining Order Documents re Yobana Puga and child 08/21/14, Case
4 #BQ045673, bate stamped *COSB009597-COSB009613*.

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6
7 DATED: January 14, 2025

LYNBERG & WATKINS
A Professional Corporation

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9
10 By: /s/ Amy R. Margolies
11 **SHANNON L. GUSTAFSON**
12 **AMY R. MARGOLIES**
13 **ANITA K. CLARKE**
Attorneys for Defendant,
COUNTY OF SAN BERNARDINO
ROBERT VACCARI, and JAKE ADAMS

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On January 14, 2025, I served the foregoing document(s) described as **DEFENDANT COUNTY OF SAN BERNARDINO ROBERT VACCCARI AND JAKE ADAMS FOURTH SUPPLEMENTAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

REFER TO ATTACHED SERVICE LIST

- ☐ **BY MAIL:** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, I deposited such envelope in the mail at Orange, California.
- ☐ **VIA ELECTRONIC MAIL (CM/ECF)** - all parties listed above have been served via electronic mail through the court's CM/ECF system, which automatically generates a Notice of Electronic Filing (NEF) allowing registered e-filers to retrieve the document.
- ☐ **BY FEDERAL EXPRESS/OVERNIGHT MAIL:** I caused the above-described document to be served on the interested parties noted as follows by Federal Express/Overnight Mail.
- ☒ **BY ELECTRONIC MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 14, 2025 at Orange, California.

/s/ Gloria Pence
Gloria Pence

SERVICE LIST

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